

1 Camellia Baray, State Bar No. 179219
2 BONJOUR, THORMAN, BARAY & BILLINGSLEY
3 24301 Southland Dr., Ste 312
4 Hayward, Ca. 94545
(510) 785-8400 (phone)
(510) 670-0995 (fax)
camellia@btbandb.com

5 Attorneys for Defendant Edwinna Firmeza
6

7 IN THE UNITED STATES DISTRICT COURT
8
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

No. CR 12-00449-1 YGR

12 Plaintiff,

STIPULATION AND ORDER TO
CONTINUE SENTENCING HEARING
FROM APRIL 18, 2013 TO
JUNE 12, 2013

13 v.

14
15 EDWINNA FIRMEZA,

Date: April 18, 2013

16 Defendant.

Time: 2:00 p.m.

Court: Hon. Yvonne Gonzalez Rogers

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18 The above-captioned matter is set on April 18, 2013 at 2:00 p.m. before the Hon. Yvonne
19 Gonzalez Rogers for sentencing. The parties request that the Court vacate this date and reset the
20 matter for sentencing on specially set date of Wednesday, June 12, 2013 at 2:00pm.
21

22 Ms. Firmeza pleaded guilty to a charge of bank fraud relating to the misrepresentation of
23 income on loan applications for two residential properties. One of the residential properties was
24 sold in foreclosure. The other has been set for trustee's sale at various times, but has never been
25 sold. Ms. Firmeza is now in the process of attempting to effectuate a short sale on that property.
26

1 According to Ms. Firmeza's real estate agent, they have completed most of what is
2 required for the short sale and are now just waiting for the bank to complete its due diligence.
3 There is no fixed date by which the bank needs to respond and Ms. Firmeza's real estate agent
4 has informed counsel that the bank could respond in a matter of weeks, or a matter of months.
5 Ms. Firmeza's real estate agent is motivated to conclude the deal and has been diligent about
6 contacting the bank's agent in an attempt to speed up this process.

8 The parties, including Probation, agree to a continuance to allow Ms. Firmeza the
9 opportunity to complete a short sale of the property – a successful sale could clarify restitution
10 issues that are currently outstanding.

12
13
14 SO STIPULATED.

16 Dated: April 10, 2013

17 _____/S/_____
18 Keslie Stewart
19 Assistant United States Attorney

20 Dated: April 10, 2013

21 _____/S/_____
22 Camellia Baray
23 Attorney for Ms. Firmeza

1 For good cause shown, the sentencing hearing set for April 18, 2013 is continued to June
2 12, 2013 at 2:00 p.m.
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4 IT IS SO ORDERED.
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7 DATED:April 16, 2013
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Hon. Yvonne Gonzalez Rogers
United States District Judge